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Information Required of Brokers and Dealers Pursuant to Section 17 of the Securities Exchange Act of 1934 and Rule 17a-5 Thereunder

REPORT FOR THE PERIOD BEGINNING	10/01/16 MM/DD/YY	AND ENDING	09/30/17 MM/DD/YY
A. RE	GISTRANT IDENT	TIFICATION	
NAME OF BROKER-DEALER: FIRST CO	MMAND FINANCIAL	PLANNING, INC.	OFFICIAL USE ONLY
ADDRESS OF PRINCIPAL PLACE OF BUS	INESS: (Do not use P.O.	Box No.)	FIRM ID. NO.
	1 FirstComm Pl	aza	
	(No. and Street)		
Fort Worth	Texas		76109
(City)	(State)		(Zip Code)
NAME AND TELEPHONE NUMBER OF PE	ERSON TO CONTACT I	N REGARD TO THIS RE	EPORT
Michael F. Morrison			(817) 731 – 8621
			(Area Code - Telephone No.)
B. ACC	those opinion is contained		
INDEFENDENT FUBLIC ACCOUNTANT W	Weaver and Tidwo		* 13
(Nam	e - if individual, state last, first		1
2821 West Seventh Street, Suite 700	Fort Worth	Texas	76107
(Address)	(City)	(State)	(Zip Code)
CHECK ONE:			- 0
X Certified Public Accountant			
Public Accountant			00
Accountant not resident in United	l States or any of its poss	essions.	0
	FOR OFFICIAL USE	ONLY	
	- CH GITTERIL OSE	V., M.	

Potential persons who are to respond to the collection of information contained in this form are not required to respond unless the form displays a currently valid OMB control number.

^{*}Claims for exemption from the requirement that the annual report be covered by the opinion of an independent public accountant must be supported by a statement of facts and circumstances relied on as the basis for the exemption. See section 240.17a-5(e)(2).

OATH OR AFFIRMATION

I, <u>Michael F. Morrison</u>, swear (or affirm) that, to the best of my knowledge and belief, the accompanying financial statements and supporting schedules pertaining to the firm of <u>First Command Financial Planning</u>, Inc., as of <u>and for the year ended September 30, 2017</u>, are true and correct. I further swear (or affirm) that neither the company nor any partner, proprietor, principal officer, or director has any proprietary interest in any account classified solely as that of a customer, except as follows:

No	ne	
		MARY ANN NIESWIADOMY My Commission Expires July 29, 2018 Signature
Mot	ary I	Chief Financial Officer Title Public 11-27-17
\times	(a)	port ** contains (check all applicable boxes): Facing page. Statement of Financial Condition.
\times	(b) (c)	Statement of Financial Condition. Statement of Income (Loss).
\times	(d) (e)	Statement of Changes in Financial Condition. Statement of Changes in Stockholders' Equity or Partners' or Sole Proprietors' Capital.
	(f) (g)	Statement of Changes in Liabilities Subordinated to Claims of Creditors. Computation of Net Capital.
\boxtimes	(h) (i)	Computation for Determination of Reserve Requirements Pursuant to Rule 15c3-3. Information Relating to the Possession or Control Requirements Under Rule 15c3-3.
	(j)	A Reconciliation, including appropriate explanation of the Computation of Net Capital Under Rule 15c3-1 and the Computation for Determination of the Reserve Requirements Under Exhibit A of Rule 15c3-3.
	(k) (l)	A Reconciliation between the audited and unaudited Statements of Financial Condition with respect to methods of consolidation. An Oath or Affirmation.
\square	(m) (n)	A copy of the SIPC Supplemental Report. A report describing any material inadequacies found to exist or found to have existed since the date of the previous audit.

^{**} For conditions of confidential treatment of certain portions of this filing, see section 240.17a-5(e)(3).

FIRST COMMAND FINANCIAL PLANNING, INC.

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Report of Independent Registered Public Accounting Firm

Board of Directors
First Command Financial Planning, Inc.

We have audited the accompanying statement of financial condition of First Command Financial Planning, Inc. (the Company) as of September 30, 2017, and the related statements of operations, changes in stockholder's equity and cash flows for the year then ended. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audit.

We conducted our audit in accordance with the standards of the Public Company Accounting Oversight Board (United States). Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of First Command Financial Planning, Inc. as of September 30, 2017, and the results of its operations and its cash flows for the year then ended, in conformity with accounting principles generally accepted in the United States of America.

The supplemental information on pages 13 through 14 has been subjected to audit procedures performed in conjunction with the audit of the Company's financial statements. The supplemental information is the responsibility of the entity's management. Our audit procedures included determining whether the supplemental information reconciles to the financial statements or the underlying accounting and other records, as applicable, and performing procedures to test the completeness and accuracy of the information presented in the accompanying supplemental information. In forming our opinion on the supplemental information, we evaluated whether the accompanying supplemental information, including its form and content, is presented in conformity with 17 C.F.R. § 240.17a-5. In our opinion, the supplemental information on pages 13 through 14 is fairly stated, in all material respects, in relation to the financial statements as a whole.

Weaver and Siduell L.S.P.

WEAVER AND TIDWELL, L.L.P.

Fort Worth, Texas November 27, 2017

FIRST COMMAND FINANCIAL PLANNING, INC. STATEMENT OF FINANCIAL CONDITION SEPTEMBER 30, 2017

ASSETS		
Cash and cash equivalents	\$	6,222,997
Marketable securities, at fair value		2,003,388
Commissions and fees receivable		5,094,430
Accounts receivable, prepaid expenses and other		2,241,660
Accounts receivable, affiliates		170,402
Advisor advanced commissions		1,819,940
Property, equipment, and software,		
net of accumulated amortization of \$2,716,145		3,032
TOTAL ASSETS	\$	17,555,849
	<u>Ψ</u>	17,000,049
LIABILITIES		
Accrued commissions payable	\$	1,747,753
Accounts payable, parent company		709,219
Accounts payable, affiliates		354,355
Other accrued liabilities		1,742,541
Total liabilities		4,553,868
STOCKHOLDER'S EQUITY		
Common stock		
Class A - voting		2,046
Class B - non-voting		927
Additional paid-in capital		116,805
Retained earnings		12,882,322
Treasury stock, at cost		(119)
Total stockholder's equity		13,001,981
TOTAL LIABILITIES AND STOCKHOLDER'S EQUITY	\$	17,555,849

FIRST COMMAND FINANCIAL PLANNING, INC. STATEMENT OF OPERATIONS YEAR ENDED SEPTEMBER 30, 2017

REVENUE	
Commission revenue	\$ 30,251,465
Account service fee income	 26,108,487
Total commissions and fee revenue	56,359,952
Investment income	38,259
Net unrealized losses on marketable securities	(6,617)
Gain on sale of property, equipment and software	6,500
Advisor service fee income	607,055
Other income	 141,177
Total revenue	57,146,326
EXPENSES	
Commissions and advisor expenses	20,734,703
General and administrative expenses	32,847,138
Interest expense	 1,340
Total expenses	 53,583,181
NET INCOME	\$ 3,563,145

FIRST COMMAND FINANCIAL PLANNING, INC. STATEMENT OF CHANGES IN STOCKHOLDER'S EQUITY YEAR ENDED SEPTEMBER 30, 2017

		Commo	n Sto	ck	Additional Paid-in Retained			easury	Total Stockholder's	
	Class A Clas		ass B Capital		Eamings	Stock		Equity		
BALANCE, September 30, 2016	\$	2,046	\$	927	\$ 116,805	\$ 11,319,177	\$	(119)	\$ 11,438,836	
Dividend paid		-		-	-	(2,000,000)		-	(2,000,000)	
Net income						3,563,145			3,563,145	
BALANCE, September 30, 2017	\$	2,046	\$	927	\$ 116,805	\$ 12,882,322	\$	(119)	\$ 13,001,981	

FIRST COMMAND FINANCIAL PLANNING, INC. STATEMENT OF CASH FLOWS YEAR ENDED SEPTEMBER 30, 2017

OF	'EKA	IING	AC I	IVI	IES

Net income	\$ 3,563,145
Adjustments to reconcile net income to	
net cash provided by operating activities	
Depreciation and net amortization/accretion expense	9,713
Gains from the sale of property and equipment	(6,500)
Unrealized losses on marketable securities	6,617
Proceeds from maturity/sales of marketable securities	1,012,000
Purchase of marketable securities	(1,020,950)
Changes in operating assets and liabilities	
Decrease in commissions and fees receivable	815,602
Increase in accounts receivable, prepaid expenses and other	(149,525)
Decrease in advisor advanced commissions	296,326
Net decrease in accounts receivable	
(payable), parent company and affiliates	(721,329)
Net increase in accrued commissions payable	196,022
Net increase in other accrued liabilities	 219,511
Net cash provided by operating activities	4,220,632
INVESTING ACTIVITIES	
Proceeds from the sale of property and equipment	6,500
Net cash provided by investing activities	 6,500
FINANCING ACTIVITIES	
Dividend declared and paid to parent company	(2,000,000)
Net cash used in financing activities	 (2,000,000)
NET INCREASE IN CASH AND CASH EQUIVALENTS	2,227,132
CASH AND CASH EQUIVALENTS, beginning of year	3,995,865
CASH AND CASH EQUIVALENTS, end of year	\$ 6,222,997

NOTE 1. ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

First Command Financial Planning, Inc. (the Company or FCFP), a wholly owned subsidiary of First Command Financial Services, Inc. (FCFS), was chartered in Texas in 1958, and is engaged in the sale of mutual funds and other variable investments to middle income American families with a concentration to United States military personnel. The Company is a licensed, fully-disclosed broker/dealer registered with the Securities Exchange Commission (SEC) and the Financial Industry Regulatory Agency (FINRA). The corporate office is located in Fort Worth, Texas.

Use of Estimates

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America (GAAP) requires management to make estimates and assumptions that affect the amounts reported in the financial statements and accompanying notes. The allocation of operating expenses from the parent company is a significant estimate. Actual results could differ from those estimates.

Recognition of Revenue

Commission revenue on sales of mutual fund investments, variable annuities and variable universal life insurance by the Company's sales advisors is recognized when earned from the mutual fund, annuity, and life insurance companies. Commissions are paid to the Company, usually monthly, as they are earned on investments made, and premiums paid by the individual investors and policy holders.

Account service fee income includes revenue sharing payments received from mutual fund companies and sub-transfer agency fees. Account service fee income is recognized at the time the services are provided, which is generally when fees are received.

Advisor service fee income represents monthly fees paid by the Company's sales advisors for systems access, compliance, marketing, and other similar services. Advisor service fee income is recognized as earned at the time the services are provided.

Advisor Advanced Commissions

From October 2015 through April 2017, the Company advanced approximately 66 months of commissions to advisors for certain mutual fund sales. The amount advanced is treated as a prepaid expense (an asset) and amortized to commission expense as commission revenue is earned on future client investment payments over the 66 months. If the account cancels or periodic investments cease during the 66 months, the unamortized amount advanced is recorded as a receivable from the advisor.

NOTE 1. ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES – CONTINUED

Cash and Cash Equivalents

For purposes of the statement of cash flows, cash and cash equivalents include demand deposits and a money market account. Carrying value approximates fair value.

Marketable Securities

Marketable securities, the majority of which are fixed maturity debt securities, are classified as trading and recorded at fair value. Changes in fair value of these marketable securities (both realized and unrealized) are recorded in the statement of operations. Realized gains and losses are included in operations and are determined by using a specific identification basis.

Commissions and Fees Receivable

Commissions receivable represents \$4,969,337 due from mutual fund companies and insurance companies for the sale and servicing of investment products by the Company's sales advisors. The fees receivable represent the accrual of \$125,093 of fees for assets under the Company's management and are collected on a quarterly basis. Based on historical collections, no allowance is deemed necessary.

Accounts Receivable, Prepaid Expenses and Other

Accounts receivable represents \$1,445,014 of fees receivable from investors' individual retirement custodial accounts. Based on historical collections, no allowance is deemed necessary.

Property, Equipment, and Software

Property, equipment, and software are carried at cost less accumulated depreciation and amortization. Depreciation and amortization are computed using the straight-line method over the following estimated useful lives:

Estimated Lives

Property and equipment Software

3 to 10 years 5 years

Expenditures for maintenance, repairs, and minor renewals are charged to operations as incurred.

NOTE 1. ORGANIZATION AND SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES CONTINUED

Advertising

The Company expenses advertising cost as incurred. Advertising expense was \$199,318 in 2017.

Income Taxes

Since December 1, 1998, the Company has been a Subchapter S corporation for federal income tax purposes. A Subchapter S corporation generally pays no federal income taxes, and its taxable income, if any, is taxed at the stockholder level. FCFS files a consolidated tax return that includes FCFP. Any tax positions are taken at the consolidated level.

Concentration of Credit Risk

Financial instruments that potentially subject the Company to concentrations of credit risk consist principally of temporary cash investments, commissions receivable, other receivables, and marketable securities. The Company places its temporary cash investments and marketable securities with financial institutions and investment companies. Therefore, the majority of these funds are not insured by the Federal Deposit Insurance Corporation. Concentrations of credit risk with respect to commissions receivable are limited due to the number of investment companies comprising the Company's supplier base.

Recent Accounting Pronouncements

Revenue Recognition – The FASB has issued new guidance regarding the recognition of revenue. The core principle of the guidance is that an entity should recognize revenue to depict the transfer of promised goods or services to customers in an amount that reflects the consideration to which the entity expects in exchange for those goods or services. Management will continue to evaluate the new rule but does not expect it to have a material impact on the accounting of the Company's revenue. The guidance also includes extensive disclosure requirements for revenue recognition. The new rule will be effective in fiscal year 2019.

Subsequent Events

The Company evaluated for recognition or disclosure, all events or transactions that occurred after September 30, 2017, through November 27, 2017, the date these financial statements were available to be issued.

NOTE 2. RELATED PARTY TRANSACTIONS

The Company shares office facilities, employees, and personnel costs with its parent company, FCFS. The Company and its parent also share other operating expenses. FCFS allocates costs to the Company that are clearly applicable to the operations of FCFP. A reasonable allocation method is used to allocate common expenses, or those costs not clearly applicable to any one legal entity, based on the number of new and existing client accounts opened from FCFS, FCFP, or both. The allocation included advisor expenses, rent, equipment usage, general and administrative expenses, advisor service fee income and other income. During the year ended September 30, 2017, FCFS allocated net expenses of \$27,347,316 to FCFP.

The Company provides services to First Command Advisory Services, Inc. (FCAS) for all necessary brokerage back office operations of its asset management operations. FCFP manages the relationships with the clearing broker dealer and various fund companies for the asset management operations. In fiscal year 2017, FCFP recorded service fee income from FCAS and First Command Europe Limited (FCEL) of \$14,291,676.

As of September 30, 2017, \$709,219 was due to FCFS for allocated expenses. This amount is reflected in the accompanying statement of financial condition as accounts payable, parent company. As of September 30, 2017, \$347,023 was due to an affiliate, First Command Bank (FCB); and \$7,332 was due to an affiliate, FCEL. These amounts are reflected as accounts payable, affiliates, in the accompanying statement of financial condition. As of September 30, 2017, \$12,938 was due from an affiliate, FCB; \$118,358 was due from an affiliate, FCAS; and \$39,106 was due from an affiliate, First Command Insurance Services, Inc. These amounts are reflected in the accompanying statement of financial condition as accounts receivable, affiliates. All intercompany balances are due on demand and are settled periodically by the payment of cash between the companies.

At September 30, 2017, FCFP had cash balances held at FCB of \$528,616.

NOTE 3. MARKETABLE SECURITIES

The aggregate cost and fair value of FCFP's marketable securities at September 30, 2017, are as follows:

Marketable securities, at cost	\$	2,005,514
Unrealized losses, net		(2,126)
Marketable securities, at fair value	_\$_	2,003,388

Unrealized losses on marketable securities were \$6,617 for the year ended September 30, 2017.

NOTE 3. MARKETABLE SECURITIES - CONTINUED

Fair Value Measurements

FASB requires disclosure of fair value information about financial instruments, whether or not recognized on the balance sheet, for which it is practicable to estimate that value. In cases where quoted market prices are not available, fair values are based on estimates using present value or other valuation techniques. Those techniques are significantly affected by the assumptions used, including the discount rate and estimates of future cash flows. FASB excludes certain financial instruments and all nonfinancial instruments from its disclosure requirements. This disclosure does not and is not intended to represent the fair value of the Company.

The Company measures the fair value of its financial assets in accordance with the hierarchy established by GAAP, which consists of three levels to indicate the quality of the fair value measurements as described below:

Level 1

Fair values are based on quoted prices in active markets for identical assets or liabilities that the Company has the ability to access as of the measurement date.

Level 2

Fair values are based on inputs other than quoted prices included in Level 1 that are observable for the asset or liability, either directly or indirectly. Level 2 inputs include quoted prices for similar assets or liabilities in active markets, quoted prices for identical or similar assets or liabilities in markets that are not active, inputs other than quoted prices that are observable for the asset or liability, or inputs that can otherwise be corroborated by observable market data.

Level 3

Fair values are based on inputs that are considered unobservable where there is little, if any, market activity for the asset or liability as of the measurement date. In this circumstance, the Company has to rely on values derived by independent brokers or internally-developed assumptions. Unobservable inputs are developed based on the best information available to the Company which may include the Company's own data or bid and ask prices in the dealer market.

NOTE 3. MARKETABLE SECURITIES - CONTINUED

The Company's marketable securities consist of investments in United States government sponsored agency securities and are classified as a trading portfolio. Management determines the fair values of these securities after consideration of data provided by third-party pricing services. The prices provided by third-party pricing services are based on observable market data inputs which can vary by security type. Such inputs include benchmark yields, available trades, broker/dealer quotes, issuer spreads, benchmark securities, bids, offers, and other market data. Where possible, these prices were corroborated against other independent sources. The Company has classified these securities as Level 2.

The classification of these securities as Level 2 is consistent with the fair value methods used in the prior year.

The following table represents assets measured at fair value on a recurring basis:

	Level 1		Level 2		Level 3		Total	
Marketable securities	\$		\$	2,003,388	\$	<u>-</u>	\$	2,003,388

NOTE 4. COMMON STOCK

At September 30, 2017, the common stock of the Company is as follows:

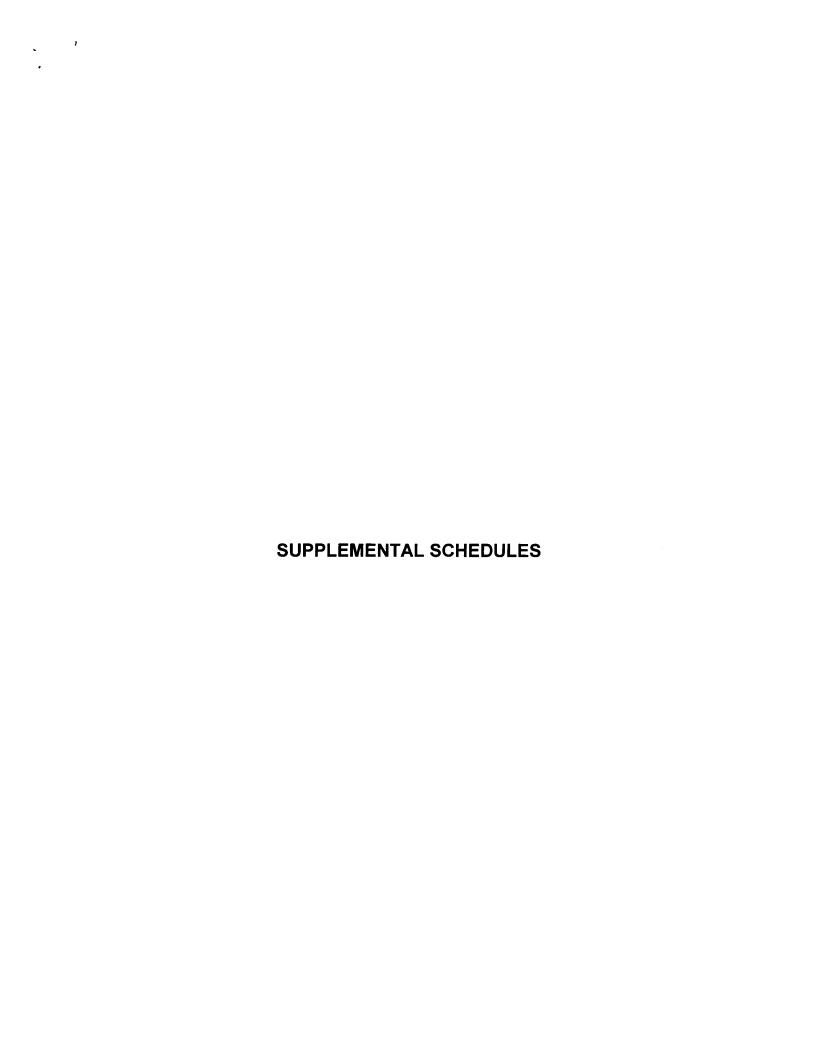
	Voting Class A			Non-voting Class B		
Par value per share	\$	0.02	\$	0.02		
Number of shares authorized		750,000		750,000		
Number of shares issued		102,300		46,368		
Number of previously issued shares		·		,		
repurchased and held as treasury stock		3,100		2,834		
Number of shares outstanding		99,200		43,534		

NOTE 5. NET CAPITAL REQUIREMENTS

The Company is subject to the SEC Uniform Net Capital Rule (SEC Rule 15c3-1), which requires the maintenance of minimum net capital and requires that the ratio of aggregate indebtedness to net capital, both as defined, shall not exceed 15 to 1. At September 30, 2017, the Company had net capital of \$5,231,684 which was \$4,928,093 in excess of its required net capital of \$303,591. The Company's aggregate indebtedness to net capital ratio was .87 to 1.

NOTE 6. COMMITMENTS AND CONTINGENCIES

The Company is not currently involved in or aware of any litigation that it believes could have a material adverse effect on its financial condition or results of operations.



FIRST COMMAND FINANCIAL PLANNING, INC. SCHEDULE G – COMPUTATION OF NET CAPITAL PURSUANT TO RULE 15c3-1 UNDER THE SECURITIES EXCHANGE ACT OF 1934 SEPTEMBER 30, 2017

NET CAPITAL, total stockholder's equity	\$	13,001,981
DEDUCTIONS AND/OR CHARGES, non-allowable assets		
Commissions and fees receivable		3,531,655
Advisor advanced commissions		1,819,940
Accounts receivable, prepaid expenses and other		2,133,515
Property, equipment, and software,		
net of accumulated depreciation and amortization of \$2,716,145		3,032
Accounts receivable, affiliates		170,402
Other deductions		2,041
Total deductions and/or charges		7,660,585
NET CAPITAL BEFORE HAIRCUTS ON SECURITIES POSITIONS		5,341,396
HAIRCUTS ON SECURITIES		109,712
NET CAPITAL	\$	5,231,684
AGGREGATE INDEBTEDNESS	\$	4,553,868
		·
TOTAL AGGREGATE INDEBTEDNESS	_\$	4,553,868
COMPUTATION OF BASIC NET CAPITAL REQUIREMENT Minimum net capital required to be greater of		
Minimum net capital pursuant to Rule 15c3-1(a)(1) or	\$	100,000
6-2/3% of aggregate indebtedness		303,591
Minimum net capital requirement	\$ \$	303,591
EXCESS NET CAPITAL	\$	4,928,093
		.,
NET CAPITAL LESS THE GREATER OF 10% OF AGGREGATE INDEBTEDNESS OR 120%		
OF MINIMUM NET CAPITAL REQUIREMENT	æ	4 776 207
OF MINIMUM NET CAPITAL REQUIREMENT		4,776,297
RATIO OF AGGREGATE INDEBTEDNESS TO NET CAPITAL		.87 to 1

There are no differences between the audited Computation of Net Capital included in this report and the corresponding schedule included in the Company's unaudited September 30, 2017, Part IIA FOCUS filing, as amended November 27, 2017.

FIRST COMMAND FINANCIAL PLANNING, INC. SCHEDULE H – STATEMENT REGARDING RULE 15c3-3 UNDER THE SECURITIES EXCHANGE ACT OF 1934 SEPTEMBER 30, 2017

First Command Financial Planning, Inc. is exempted from Rule 15c3-3 of the Securities and Exchange Commission by paragraphs (k)(2)(i) and (k)(2)(ii) of that Rule. Refer to the Exemptive Provisions Report for stated exceptions regarding Rule 15c3-3 under the Securities and Exchange Commission Act of 1934.

FIRST COMMAND FINANCIAL PLANNING, INC.
EXEMPTION REPORT
SEPTEMBER 30, 2017

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Report of Independent Registered Public Accounting Firm

Board of Directors
First Command Financial Planning, Inc.

We have reviewed management's statements, included in the accompanying First Command Financial Planning's Exemption Report, in which (1) First Command Financial Planning, Inc. (the Company) identified the following provisions of 17 C.F.R. § 15c3-3(k) under which the Company claimed an exemption from 17 C.F.R. § 240.15c3-3: (k)(2)(i) and (k)(2)(ii) (the "exemption provisions") and (2) the Company stated that the Company met the identified exemption provisions throughout the year ended September 30, 2017 except as described in its exemption report. The Company's management is responsible for compliance with the exemption provisions and its statements.

Our review was conducted in accordance with the standards of the Public Company Accounting Oversight Board (United States) and, accordingly, included inquiries and other required procedures to obtain evidence about the Company's compliance with the exemption provisions. A review is substantially less in scope than an examination, the objective of which is the expression of an opinion on management's statements. Accordingly, we do not express such an opinion.

Based on our review, we are not aware of any material modifications that should be made to management's statements referred to above for them to be fairly stated, in all material respects, based on the provisions set forth in paragraph (k)(2)(i) and (k)(2)(ii) of Rule 15c3-3 under the Securities Exchange Act of 1934.

Weaver and Sidwell, L.S.P.

WEAVER AND TIDWELL, L.L.P.

Fort Worth, Texas November 27, 2017



First Command Financial Planning, Inc. Exemption Report

First Command Financial Planning, Inc. (the Company) is a registered broker-dealer subject to Rule 17a-5 promulgated by the Securities and Exchange Commission (17 C.F.R. §240.17a-5, "Reports to be made by certain brokers and dealers"). This Exemption Report was prepared as required by 17 C.F.R. §240.17a-5(d)(1) and (4). To the best of its knowledge and belief, the Company states the following:

- (1) The Company claimed an exemption from 17 C.F.R. §240.15c3-3 under the following provisions of 17 C.F.R. §240.15c3-3(k)(i) and (k)(ii).
- (2) The Company met the identified exemption provisions in 17 C.F.R. §240.15c3-3(k) throughout the most recent fiscal year except as described below.

The following exceptions relate to client checks received in a branch and delayed due to mailing of check and paperwork to the Company's bank for processing:

Days Exception Existed	k2i	k2ii	Total
2	18	9	27
3	2	-	2
4	1	1	2
5	2	1	3
7	-	2	2
8	-	1	1
13	1	-	1
18	-	3	3
26	-	1	1
29	-	1	1
31	1		1
Total	25	19_	44_
Unknown errors	1		1

The following exceptions relate to client checks received in a branch that should have been mailed directly to the retail mutual fund company instead of the corporate office for processing:

	k2i	<u>k2ii</u>	Total
Exceptions	225_		225

First Command Financial Services, Inc., parent of First Command Financial Planning, Inc. (Member SIPC, FINRA), First Command Advisory Services, Inc. and First Command Insurance Services, Inc., a broker-dealer. Financial planning and Investment advisory services are offered by First Command Financial Planning, Inc., a broker-dealer. Financial planning and investment advisory services are offered by First Command Advisory Services, Inc., an investment advisor, Insurance products and services are offered by First Command Financial Services, Inc. (a separate Montana domestic corporation).

The following exceptions relate to client checks received in a branch that were mailed to the corporate office instead of the Company's bank for processing:

	<u> k2i</u>	k2ii	Total
Exceptions	15_	137_	152_

First Command Financial Planning, Inc.

I, Michael F. Morrison, swear (or affirm) that, to my best knowledge and belief, this Exemption Report is true and correct for the fiscal year ended September 30, 2017.

Michael F. Morrison, CFO November 27, 2017